

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EASTERN PROFIT CORPORATION)	
LIMITED,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	Case No. 18-cv-2185
v.)	
)	
STRATEGIC VISION US, LLC,)	
)	
Defendant/Counterclaim Plaintiff.)	
)	

DEFENDANT’S REQUEST FOR JUDICIAL NOTICE

Defendant Strategic Vision US, LLC (“Strategic Vision”), pursuant to Fed. R. Evid. 201, requests that the Court take judicial notice of the matters discussed herein in connection with Strategic Vision’s Fed. R. Civ. P. 56 motion for summary judgment. Fed. R. Evid. 201 allows the Court to take judicial notice regarding a fact “that is not subject to reasonable dispute because it . . . can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). The Court can take judicial notice of a fact at any stage of the proceeding. Fed. R. Evid. 201(d).

Strategic Vision requests the Court take judicial notice of the following information and materials.

1. Strategic Vision is a single-member limited liability company registered and in good standing with the Nevada Secretary of State, as reflected by information maintained by the Nevada Secretary of State. The record attached hereto as Ex. A is the current Nev. Sec. of State description of Strategic Vision’s registration and can be obtained by accessing the official website of the Secretary of State (<https://www.nvsos.gov/sos>), under the tab “Search Businesses,” inserting the name “Strategic Vision,” and finding filing date May 31,

2011 and/or registration number (NV20111365694), and clicking the link to Ex. A as the business entity information for Strategic Vision.

2. Biographical information for Dr. Lianchao Han can be found by accessing the website <http://www.initiativesforchina.org/> and navigating to the section “About Han Lianchao.” That section indicates that Dr. Han immigrated to the United States from China, and worked in the U.S. Senate for several years. After the Tiananmen Square Massacre in 1989, Dr. Han helped found the Independent Federation of Chinese Students and Scholars.

3. Eastern Profit Corporation Ltd. is not currently registered with the State of New York, which is capable of verification by accessing the on-line records of the New York Department of State, Division of Corporations, State Records, and UCC at https://www.dos.ny.gov/corps/bus_entity_search. After accessing this address, search criteria includes “Business Entity Name.” Inserting “Eastern Profit Corporation Ltd.” and status of “active only” indicates “No business entities were found for Eastern Profit Corporation Ltd.”

4. Dr. J. Michael Waller gave deposition testimony in this case. Dr. Waller is a Ph.D. in international security affairs and advises in strategic communications, with a focus on intelligence, political warfare, public diplomacy, and terrorism avoidance. Biographical information about Dr. Waller, including this, can be verified by accessing Dr. Waller’s website, <http://jmichaelwaller.com>, and navigating to the section “About Dr. Waller.”

5. Dkt. 203-2 herein is an Oct. 18, 2018 order of the High Court of Hong Kong concerning, among other entities, Eastern Profit Corp. Ltd. (“Eastern Profit”), the plaintiff herein. Eastern Profit is referred to as “Respondent 16” on p. 14/27 of the order, which indicates that Eastern Profit’s bank account was frozen. At the time, it had approx. \$550,000 HK. A search on the Internet of <https://www.poundsterlinglive.com/best-exchange-rates/us->

dollar-to-hong-kong-dollar-exchange-rate-on-2018-10-18 shows that the exchange rate on Oct. 18, 2018 was an average of 1 USD = 7.8383 HKD.

Dated March 16, 2020

Respectfully submitted,

GRAVES GARRETT LLC

s/ Edward D. Greim

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ATTORNEYS FOR

DEFENDANT/COUNTERCLAIM PLAINTIFF

CERTIFICATE OF SERVICE

This certifies that, on March 16, 2020, the foregoing was served on all counsel of record via the Court's Electronic Case Filing System.

s/ Edward D. Greim

Attorneys for Defendant/Counterclaim Plaintiff